

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRYAN P. FLANAGAN,

Defendant.

CASE NUMBER 20-mj-8095-GCS

FILED UNDER SEAL

CRIMINAL COMPLAINT

I, Jacob Frechette, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1

DISTRIBUTION OF CHILD PORNOGRAPHY

On or about March 29, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, did knowingly distribute visual depictions containing child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including but not limited to the following: image file “**unified_message_232718757781030.jpg**”, which depicts child pornography, that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT 2

INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT

On or about March 29, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, knowingly transmitted in interstate and foreign commerce a communication over the internet, from the State of Illinois to the State of Tennessee, with the intent to extort from B.G., a minor, nude photos and videos, containing a threat to rape a female minor; all in violation of Title 18, United States Code, Section 875(c).

COUNT 3

DISTRIBUTION OF CHILD PORNOGRAPHY

On or about March 29, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, did knowingly distribute visual depictions containing child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including but not limited to the following: image file “**unified_message_974917056238610.jpg**”, which depicts child pornography, that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT 4

INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT

On or about March 29, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, knowingly transmitted in interstate and foreign commerce a communication over the internet, from the State of Illinois to the State of Missouri, with the intent to extort from M.G., a minor, nude photos and videos, containing a threat to rape a female minor; all in violation of Title 18, United States Code, Section 875(c).

COUNT 5

INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT

On or about March 31, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, knowingly transmitted in interstate and foreign commerce a communication over the internet, from the State of Illinois to the State of California, with the intent to extort from D.I., a minor, nude photos and videos, containing a threat to rape a female minor; all in violation of Title 18, United States Code, Section 875(c).

COUNT 6

INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT

On or about March 30, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, knowingly transmitted in interstate and foreign commerce a communication over the internet, from the State of Illinois to the State of Texas, with the intent to extort from D.A., a minor, nude photos and videos, containing a threat to rape a female minor; all in violation of Title 18, United States Code, Section 875(c).

COUNT 7

INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT

On or about March 29, 2020, in Marion County, Illinois, which is within the Southern District of Illinois,

BRYAN P. FLANAGAN,

defendant herein, knowingly transmitted in interstate and foreign commerce a communication over the internet, from the State of Illinois to the State of Pennsylvania, with the intent to extort from K.N., phone numbers and contact information of additional potential minor victims, containing a threat to rape a female minor; all in violation of Title 18, United States Code, Section 875(c).

(Forfeiture Allegation)

Upon conviction for the offense charged in Count 1, defendant **BRYAN P. FLANAGAN** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography and any and all property used and intended to be used in any manner or part to commit and to promote the commission of the aforementioned offenses.

The property that is subject to forfeiture referred to above includes, but is not limited to, the following:

1. Black Motorola Moto e6 cellular phone having serial number ZY326NZQZK and model number XT2005-4;

I further state that this complaint is based on the following facts:

INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) assigned to the FBI's Springfield Division, Fairview Heights Resident Agency, in Fairview Heights, Illinois. I

have been employed by the FBI since January 2019. My employment has vested me with the authority to investigate violations of federal law, including Title 18, U.S.C. §§ 2252 and 2252A, all involving the Sexual Exploitation and Other Abuse of Children. During my time at the FBI Academy and since then, I have received training in a variety of investigative and legal matters, including topics of searches, drafting search warrant affidavits, and Probable Cause. I am presently assigned to the Springfield Violent Crimes Against Children Squad, which focuses on investigating individuals and dismantling organizations responsible for the sexual exploration of children through the manufacture and distribution of child pornography. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. In connection with such investigations, I have served as case agent, have been the affiant for several search warrants and I have conducted interviews of subjects, victims, and witnesses. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **BRYAN P. FLANAGAN** committed violations of Title 18, United States Code, Sections 875(c), 2422(b);

2252(a)(2) and (b) and 2423(b).

STATUTORY AND LEGAL AUTHORITY

4. This investigation concerns violations committed in the Southern and Northern Districts of Illinois of Title 18, United States Code, Section 2422(b), relating to the enticement or the attempted enticement of minors to engage in prostitution or any sexual activity for which any person can be charged. Based upon my training and experience, as well as conversations with other experienced law enforcement officers and experienced federal prosecutors, I know the following:

a. 18 U.S.C. 2422(b) prohibits using any facility or means of interstate commerce to knowingly persuade, induce, entice or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempt to do so.

b. 18 U.S.C. 2423(b) prohibits travel in interstate commerce to engage in illicit sexual conduct.

c. The internet is a facility of interstate commerce.

**BACKGROUND OF INVESTIGATION AND
FACTS ESTABLISHING PROBABLE CAUSE**

5. On approximately April 8, 2020 to April 9, 2020, J.S., a female victim residing in Bozeman, Montana, received multiple phone calls from an adult male whose voice she did not recognize. The male told Sands that he had a ten year-old girl with him, and that he was going to have sex with the child if Sands did not stay on the phone with him. Sands said that the male called from multiple phone numbers including several that showed the caller ID of "restricted". Sands said that the male also texted her from multiple numbers. She said the male threatened to "punish" the child, "cum on her face", and that "he would fuck her" if Sands did not comply with his requests. Sands said during one phone call she "heard him making the sounds of having an

orgasm". Sands was concerned for the safety of the unknown child and informed the Bozeman Police Department (BPD) of the calls.

6. Sands provided five phone numbers to the BPD of which only one, (331) 220-2484, went to a generic voicemail. BPD contacted Sprint, the provider for the phone, and requested records pertaining to the number and a location. The phone was subscribed to **BRYAN FLANAGAN** and a ping of the phone placed it in Centralia, Illinois, at 38.53045, -89.09714. This location placed the phone within 110 meters of 102 Fairway Drive, Centralia, Illinois, 62801, within the Southern District of Illinois. This location is where **FLANAGAN** was known to have lived in May of 2020.

7. A criminal background check of **FLANAGAN** revealed a previous state felony conviction out of Marion County, Illinois, for Harassing and Obscene Communications. **FLANAGAN'S** probation officer confirmed that the previous conviction was for similar events that occurred in 2018.

8. A review of records received from Facebook pursuant to a subpoena revealed an account with the username Troy Davis and the phone number (331) 220-2484 that was already associated with **FLANAGAN**. The last GPS coordinates associated with the account were on March 28, 2020, and placed the phone approximately 80 yards from one of **FLANAGAN'S** previous addresses, 103 Isle St. S., Sandoval, Illinois, within the Southern District of Illinois. The records also revealed at least 51 different victims from across the United States between February and March of 2020. The violations range include production and attempted production of child pornography, attempted enticement of a minor, distribution of child pornography, interstate extortion, and dissemination of obscene material to a minor. A review of the records is still

ongoing, but this affiant has identified at least eleven victims whom **FLANAGAN** extorted while he was living in the Southern District of Illinois between March 29, 2020 and March 31, 2020.

9. **FLANAGAN**, posing as Troy Davis, would begin communicating with a victim in a normal manner. At first he would want to know what the victim was doing, what their age was, and to see a picture of them. Eventually **FLANAGAN** would start making the conversation more sexual by asking the victim if they were a virgin or asking them to watch him masturbate. **FLANAGAN** would often begin calling or video chatting with the victim through Facebook Messenger at which point he would masturbate over a video chat or call. Usually he would ask them to masturbate in front of him as well. If things were not going well, he would then say he had a minor female with him, and if his current victim did not do what he wanted, he would molest, rape, or even kill the minor female with him. Generally the minor female was described by **FLANAGAN** as nine or ten years old and named Ashley. **FLANAGAN** generally used a photo of a nine-year-old female that reverse image searches have found online.

10. On May 19, 2020, **FLANAGAN** was arrested by the Marion County Sheriff's Office on an arrest warrant for a probation violation. This affiant interviewed **FLANAGAN** immediately following his arrest in the Marion County Jail. During the interview, **FLANAGAN** admitted to having made an unknown number of harassing phone calls to women since over the last 19 years. These phone calls involved both adult and minor females and were often of a sexual nature. **FLANAGAN** admitted to using threats of violence against a minor child if the female would not do what he ordered. Often **FLANAGAN** would make them watch him masturbate through video chat, or he would make them masturbate in front of him through video chat. **FLANAGAN** also admitted to having several Facebook accounts with the username Troy Davis.

He used these accounts to find adult and minor females and extort them into doing what he wanted.

11. **FLANAGAN** provided the FBI with consent to search his phone. Most files on the phone prior to April 27, 2020, were deleted. **FLANAGAN** search history contained searches such as the following:

- “Preteen Pussy”
- “junior pussy”
- “Young Lolita Forced Porn”
- “10 year old girl shorts”
- “12 year old girl in panties”
- “Dad Incest Forsome Porn”
- “Mom and daughters Fuck Daddy Porn”
- “Preteen models sex”
- “Molest Porn”
- “Teen Molested Porn”
- “Little Girls Molested Porn”
- “Teenage nudism”
- “j.u.n.i.o.r Pussy”

12. A review of the websites visited by **FLANAGAN** revealed likely accounts on Care.com and Sittercity.com. His browsing history showed that he was accessing web pages on these sites with the titles “Inbox”, “Jobs”, “Find a babysitter near me”, and “Background Checks”. **FLANAGAN** also visited multiple other web pages and sites that tend to have images of minor females such as the following:

- Facebook - Sandoval High School Cheerleaders
- Facebook - Sandoval High School Volleyball
- Facebook - High School Sports Photography
- Spsl.org – SPSL 4A Athletic, SPSL 4A Cheer
- Studio50.org – Dance, Tumbling, and Cheer

13. A computer application titled “Hello Yo” was found on **FLANAGAN’S** phone. The application is similar to Kik. It allows people chat in groups or to privately message each other. The conversations found there all took place in May of 2020. In one such conversation,

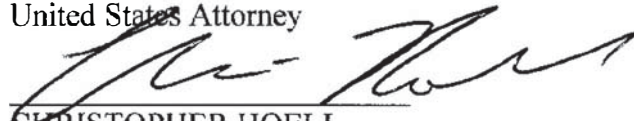
Subscribed and sworn to before me this

1st day of June 2020, at Fairview Heights, Illinois.


Digitally signed by
Judge Sison
Date: 2020.06.01
16:35:50 -05'00'

GILBERT C. SISON
United States Magistrate Judge

STEVEN D. WEINHOFET
United States Attorney


CHRISTOPHER HOELL
Assistant United States Attorney

FLANAGAN asks what appears to be a minor female to send him photos of the minor female being sodomized by her brother with a curling iron or brush. Most of the conversations tend to follow the same ploy that **FLANAGAN** used with his Troy Davis account on Facebook.

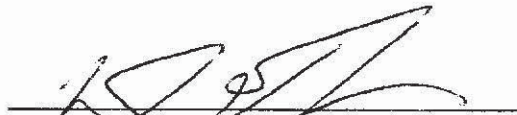
14. An investigation led by the FBI into **FLANAGAN** is ongoing. At this time, the FBI has information that **FLANAGAN** contacted at least 59 female victims around the United States using either fake social media accounts or by calling their cell phones. The majority of these victims are minors. **FLANAGAN** used a similar ploy as in the Bozeman, Facebook, and Hello Yo incidents to attempt to obtain nude images or video of these victims and/or get the victims to engage in video chats with **FLANAGAN** where he would be nude or masturbating. In one such investigation between **FLANAGAN** and a victim believed to be a minor, **FLANAGAN** wrote the following:

- “are u really 12”
- “I’ll pay u a lot of money to have sex with me”

Attempts are ongoing to identify and interview these victims.

CONCLUSION

15. Based on the foregoing, I submit that there is probable cause to believe that between March 29, 2020 and May 19, 2020, **BRYAN P. FLANAGAN** committed the offenses set forth in Counts 1-7 of this Complaint.


JACOB FRECHETTE, Special Agent
Federal Bureau of Investigation